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July 15, 2022

VIA ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: *Roche Cyrulnik Freedman LLP v. Cyrulnik*, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

Pursuant to Rule 6.A.2 of Your Honor's Individual Practices, I write on behalf of Counterclaim-Plaintiff Jason Cyrulnik ("Cyrulnik") to request permission to file under temporary seal the document attached as Exhibit A to Cyrulnik's July 15, 2022 letter, filed concurrently herewith, which notifies the Court of new evidence in connection with Cyrulnik's brief in opposition (Dkt. 126) to the motion to dismiss filed by Counterclaim-Defendants Nathan Holcomb, Edward Normand, and Amos Friedland (Dkt. 107-108).

Exhibit A contains information that Counterclaim-Defendants contend is confidential and warrants sealing. Although Cyrulnik does not believe the information in Exhibit A warrants sealing, we make this request in the interest of affording Counterclaim-Defendants the opportunity to file a motion for longer-term sealing, to which motion Cyrulnik will respond in due course. In accordance with Rule 6.A.2 of your Honor's Individual Practices, we have notified Counterclaim-Defendants of their obligation to file a letter within three days explaining the need to seal the materials.

We thank the Court for its consideration of this request.

Respectfully,



Gavin D. Schryver

cc: Counsel of Record (via ECF)